

INSPECTION ADMINISTRATIVE PROCEDURE

A-106

VERIFICATION OF CORRECTIVE ACTIONS

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Revision 3

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INSPECTION ADMINISTRATIVE PROCEDURE A-106, REV. 3

VERIFICATION OF CORRECTIVE ACTIONS

1.0 PURPOSE

This procedure establishes the process for evaluating the adequacy of the Contractor's corrective actions to identified deficiencies. These corrective actions may be described in Occurrence Reports, in responses to WTP Safety Regulation Division (OSR) inspection Findings, Corrective Action Notices, and issues/concerns identified in other formal communications. This procedure also may be used to evaluate whether: (1) root causes leading to the deficiencies have been identified, (2) generic implications have been addressed, and (3) the Contractor's quality assurance and technical programs have been appropriately strengthened to prevent recurrence of the deficiencies.

2.0 POLICY

The OSR inspection staff should review Contractor corrective actions associated with deficiencies identified by the OSR that required Contractor corrective actions specified in Contractor-initiated occurrence reports or other formal inspection-related communications. These reviews should assess the adequacy of the Contractor's actions and be documented in inspection reports.

3.0 DEFINITIONS

Authorization Basis. The composite of information provided by the Contractor in response to radiological, nuclear, and process safety requirements that are the bases on which the DOE grants permission to perform regulated activities. The following are specific documents (including material incorporated by reference) that help to form the Authorization Basis:

- Safety Requirements Document (SRD), Volume II, 24590-WTP-SRD-ESH-01-001-02
- Integrated Safety Management Plan (ISMP), 24590-WTP-ISMP-ESH-01-001
- Preliminary Safety Analysis Report to Support Construction Authorization, General Information, 24590-WTP-PSAR-ESH-01-002-01
- Preliminary Safety Analysis Report to Support Construction Authorization, PT Facility Specific Information, 24590-WTP-PSAR-ESH-01-002-02
- Preliminary Safety Analysis Report to Support Construction Authorization, LAW Facility Specific Information, 24590-WTP-PSAR-ESH-01-002-03
- Preliminary Safety Analysis Report to Support Construction Authorization, HLW Facility

Specific Information, 24590-WTP-PSAR-ESH-01-002-04

- Preliminary Safety Analysis Report to Support Construction Authorization, Balance of Facility Specific Information, 24590-WTP-PSAR-ESH-01-002-05
- Revision to the BOF PSAR Adding Facilities/Systems to the Construction Authorization Request, 24590-WTP-ABCN-ESH-02-014
- Quality Assurance Manual (QAM), 24590-WTP-aQAM-QA-01-001
- Radiation Protection Program for Design and Construction (RPP), 24590-WTP-RPP-ESH-01-001
- The information submitted in connection with a request for Standards Approval, a request for Construction Authorization, a request for Commissioning Authorization, or an Initial Safety Assessment. This includes the information associated with the requests as described in DOE/RL-96-0003, *DOE Regulatory Process for Radiological, Nuclear, and Process Safety for the River Protection Project Waste Treatment Plant Contractor*, and any other information submitted by the Contractor in connection with the requests.
- Amendments to the information described above that are on the Contractor's docket. Such amendments may be in the form of revisions to previously submitted documents, or new information that supplements previously submitted information.

The authorization basis begins at the Standards Approval regulatory action and continues throughout the design, construction, operations, and decommissioning of the River Protection Project Waste Treatment and Immobilization Plant Contractor facility.

Assessment Follow-up Item: A matter that requires further inspection because of a potential problem, because specific Contractor or OSR action is pending, or because additional information is needed that was not available at the time of the inspection.

Finding. An inconsistency with a commitment in the authorization basis or an item that is not in compliance with a requirement in the SRD or applicable regulations.

Occurrence Report: A report generated by the Contractor describing an event or condition that meets the Contractor's reporting threshold.

4.0 GENERAL REQUIREMENTS

4.1 DOCUMENTATION REVIEW

The inspectors should review Contractor corrective actions to verify they were timely and appropriate. When warranted, determine (1) whether the Contractor conducted an in-depth root-cause analysis and implemented appropriate changes such as hardware modifications, training or procedure changes, or other actions as appropriate; (2) generic implications were addressed; and

(3) the Contractor's safety management practices and procedures were strengthened, as appropriate, to prevent recurrence. Also, review pertinent records, audits, and reports to determine if the Contractor's oversight practices should have identified the item. Generally, Contractor responses to OSR Findings or Contractor-identified occurrence reports should receive additional onsite follow-up inspections. The extent of onsite inspections should be based on the safety significance and complexity, apparent inadequacy, or apparent weaknesses in Contractor administrative or management controls.

NOTE: An assessment follow-up item may be closed simply by administrative action when OSR management decides not to expend the effort originally envisioned when the follow-up item was opened. If this is done, it should be documented in an inspection report along with the reason for the closure.

4.2 ONSITE INSPECTION

In most instances, the OSR will conduct an onsite inspection of corrective actions with respect to the timeliness, completeness, and adequacy of Contractor actions. Where appropriate, the inspections should include review of changes to equipment and processes. Generally, the following questions should be considered.

- Has the Contractor forwarded copies of the response to the OSR, as appropriate?
- Have corrective actions been implemented?
- Were follow-up actions initiated for related deficiencies noted in any recent audits conducted by the Contractor?
- Were root-cause analyses, generic implications, and trend analyses considered by the Contractor?
- Was the PSAR updated, if required?
- Were training requirements, procedures, and drawings revised, if required?

5.0 INSPECTION GUIDANCE

5.1 GENERAL GUIDANCE

The OSR's inspection program places strong emphasis on the inspection of Contractor performance as the basis for determining the overall adequacy of the implementation of the Contractor's safety management processes. Thus, when a deficiency in Contractor performance is identified, and especially when repetitive deficiencies occur, a key element to consider will be a failure of the Contractor's self-assessment and corrective action process to identify and correct the deficiency. For selected areas, the inspection will focus on individuals, procedures, and practices to verify specified objectives have been achieved.

Whether immediate OSR follow-up to a routine inspection Finding is needed will depend on an evaluation of the safety significance of the inspection Finding and whether the OSR has knowledge of its probable cause. Findings with safety significance will require immediate follow-up, whereas those of lesser safety significance may be delayed. Furthermore, even if the Finding has safety significance immediate OSR follow-up may not be necessary if the inspectors have developed information as to the probable root cause during their normal inspection activities.

The OSR's documentation review may involve extensive communication with the Contractor to clarify, elaborate, or provide for further documentation.

5.2 ONSITE INSPECTION

During an onsite inspection of the Contractor's corrective actions, the assigned inspectors should review pertinent documents such as the following:

- Inspection reports
- Inspection report transmittal letters
- Contractor deficiency and corrective action documents
- Contractor response letters
- Other related documents associated with the Contractor's corrective actions such as procedures and the QA Manual

The onsite inspection should examine whether the Contractor's evaluation included a review of findings from internal audits and self-assessments in arriving at determinations on the repetitive and generic nature of an OSR Finding and the effectiveness of Contractor programs. Where an item is identified as repetitive, the Contractor should have conducted an in-depth analysis of the effectiveness of management control systems. This entails the determination of root causes of deficient management controls and their potential generic implications.

Attachments: None